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**Objections Due:** January 20, 2017 at 4:00 p.m. (ET)

**Objections Due (HSBC Entities only):** February 6, 2017 at 4:00 p.m. (ET)

**Second Amended Presentment Date:** February 7, 2017 at 10:00 a.m. (ET)

**Hearing Date:** None, unless objections are filed

*Proposed Special Litigation Counsel to William A. Brandt Jr.,  
Chapter 11 Trustee for CFG Peru Investments Pte. Ltd. (Singapore)*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                |   |                                   |
|--------------------------------|---|-----------------------------------|
| -----                          | X |                                   |
| In re:                         | : | Case No. 16-11895 (JLG)           |
|                                | : |                                   |
| CHINA FISHERY GROUP LIMITED    | : | Chapter 11 (Jointly Administered) |
| (CAYMAN), <u>et al.</u> ,      | : |                                   |
|                                | : |                                   |
| Debtors.                       | : |                                   |
| -----                          | X |                                   |
| In re:                         | : | Case No. 16-11914 (JLG)           |
|                                | : |                                   |
| CFG PERU INVESTMENTS PTE. LTD. | : | Chapter 11                        |
| (SINGAPORE),                   | : |                                   |
|                                | : |                                   |
| Debtor.                        | : |                                   |
| -----                          | X |                                   |

**SECOND AMENDED NOTICE OF OBJECTION DEADLINE AND PRESENTMENT  
DATE WITH RESPECT TO MOTION OF WILLIAM A. BRANDT, JR., CHAPTER 11  
TRUSTEE, PURSUANT TO 11 U.S.C. §§ 105(a) AND 1106(a)(3), FED. R. BANKR. P.  
2004 AND 9016, AND L. BANKR. R. 2004-1, FOR ORDER AUTHORIZING ISSUANCE  
OF SUBPOENAS TO HONGKONG SHANGHAI BANKING CORPORATION LIMITED  
DIRECTING PRODUCTION OF DOCUMENTS AND EXAMINATION OF  
WITNESSES AND GRANTING RELATED RELIEF [ECF NO. 299]**

PLEASE TAKE NOTICE THAT upon the accompanying Motion, William A. Brandt, Jr., the chapter 11 trustee (the “Trustee”) for CFG Peru Investments Pte. Ltd. (Singapore), will move before the Honorable James L. Garrity, Jr. of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004, on **February 7, 2017 at 10:00 a.m. (ET)** (the “**Second Amended Presentment Date**”) or such other time as the Court may determine, pursuant to sections 105(a) and 1106(a)(3) of title

11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2004-1 of the Local Bankruptcy Rules for the Southern District of New York, for the entry of an Order authorizing the issuance of subpoenas to the Hongkong Shanghai Banking Corporation Limited and its affiliates directing the production of documents and examination of witnesses from HSBC and granting related relief (the “Motion”). The Motion is docketed at ECF No. 299.

**PLEASE TAKE FURTHER NOTICE THAT** on December 27, 2016, the Trustee filed the *Notice of Motion of William A. Brandt, Jr., Chapter 11 Trustee, Pursuant to 11 U.S.C. §§ 105(a) and 1106(a)(3), Fed. R. Bankr. P. 2004 And 9016, and L. Bankr. R. 2004-1, For Order Authorizing Issuance of Subpoenas to Hongkong Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses and Granting Related Relief* [ECF No. 293 (Case No. 16-11895); ECF No. 49 (Case No. 16-11914)] (the “Notice Of Motion”). Capitalized terms not defined herein have the meanings ascribed to them in the Notice Of Motion.

**PLEASE TAKE FURTHER NOTICE THAT** the Notice Of Motion established the Objection Deadline for the Motion of January 20, 2017 at 4:00 p.m. (ET) and the Presentment Date for the Motion as January 23, 2017 at 10:00 a.m.

**PLEASE TAKE FURTHER NOTICE THAT** on January 20, 2017, the Trustee filed the *First Amended Notice of Motion of William A. Brandt, Jr., Chapter 11 Trustee, Pursuant to 11 U.S.C. §§ 105(a) and 1106(a)(3), Fed. R. Bankr. P. 2004 and 9016, and L. Bankr. R. 2004-1, For Order Authorizing Issuance of Subpoenas to Hongkong Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses and Granting Related Relief* [ECF No. 322 (Case No. 16-11895); ECF No. 62 (Case No. 16-11914)] (the “First Amended Notice of Motion”), which extended the Objection Deadline to January 31, 2017 at 4:00 p.m.

(prevailing Eastern Time) and the Presentment Date to February 1, 2017 at 10:00 a.m.

(prevailing Eastern Time) solely with respect to the Hongkong Shanghai Banking Corporation Limited, HSBC North America Holdings, Inc., HSBC North America Inc., and HSBC USA, Inc. (collectively, the “HSBC Entities”).

**PLEASE TAKE FURTHER NOTICE THAT** that solely with respect to the HSBC Entities, the Objection Deadline has been extended to February 6, 2017 at 4:00 p.m. (prevailing Eastern Time) and the Second Amended Presentment Date shall be February 7, 2017 at 10:00 a.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE THAT** that in addition to being filed before the Objection Deadline, any objections made by HSBC Entities must be filed and served in compliance with the procedures set forth in the Notice Of Motion.

**PLEASE TAKE FURTHER NOTICE THAT** if an Objection to the Motion is not filed and received on or before the applicable Objection Deadline, the relief requested in the Motion shall be deemed unopposed, and the Bankruptcy Court may enter an Order granting the relief sought in the Motion without a hearing to consider the Motion (the “**Hearing**”) at any time on or after the Second Amended Presentment Date.

**PLEASE TAKE FURTHER NOTICE THAT** objecting parties are required to attend the Hearing (if any), and failure to appear at any such Hearing may result in the relief requested in the Motion being granted upon default.

Dated: January 30, 2017  
New York, New York

Respectfully submitted,

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

By: /s/ SUSHEEL KIRPALANI  
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